

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

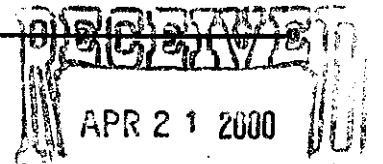
THE DEPARTMENT OF TRANSPORTATION OF
THE STATE OF ILLINOIS, for and in
behalf of the People of the State of
Illinois,

Petitioner,

v.

BURLINGTON NORTHERN & SANTA FE
RAILWAY COMPANY,

Respondent.



Case No. T 00-0027

Parcels 6058109PE and
6058109TE

**RESPONDENT'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS DIRECTED TO PETITIONER**

Now comes respondent, The Burlington Northern and Santa Fe Railway Company, by its attorneys, Kenneth J. Wysoglad & Associates and requests that petitioner, the Department of Transportation of the State of Illinois, produce within twenty-eight (28) days of service hereof the following documents to the offices of Kenneth J. Wysoglad & Associates, 118 S. Clinton Street, Suite 700, Chicago, Illinois, 60661:

1. Copies of any and all correspondence, memorandum, notes of conversation, draft agreement, print diagrams, construction plans, plats of survey or other documents provided by petitioner, its employees, agents or representatives to respondent, its employees, agents or representatives, concerning or in any way relating to the property taking and/or improvement project as referred to in petitioner's petition for approval to take property filed in the above captioned cause.

2. Copies of any and all correspondence, memorandum, notes of conversation, draft agreements, proposed easement documents,

DOCKETED

proposals, diagrams or other informational writings submitted by respondent, its employees, agents or representatives to petitioner, its employees, agents or representatives relative to the property taking or improvement project referred to in petitioner's petition to take property.

KENNETH J. WYSOGLAD & ASSOCIATES


Michael L. Sazdanoff

Michael L. Sazdanoff
Kenneth J. Wysoglad & Associates
Attorneys for Respondent
The Burlington Northern and Santa Fe Railway Company
118 S. Clinton Street, Suite 700
Chicago, Illinois 60661
(312) 441-0333

PROOF OF SERVICE

Michael L. Sazdanoff, an attorney, being first duly sworn on oath, deposes and says that on the 14th day of APRIL, 2000, he caused to be served, a true and correct copy of **RESPONDENT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO PETITIONER** upon:

Mr. Stanley L. Morris
Special Assistant Attorney General
Three North Old State Capital Plaza
P.O. Box 255
Springfield, IL 62705-0255

by depositing same in the U.S. Mail depository located at Adams and Clinton Streets, Chicago, Illinois in an envelope(s) with first-class postage, prepaid.